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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

KATERINA B. EYRE, TIM FREEMAN,
MAZAMA SPORTING GOODS, NATIONAL
SHOOTING SPORTS FOUNDATION, and
OREGON STATE SHOOTING
ASSOCIATION,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, Attorney General
of Oregon, and TERRI DAVIE, Superintendent
of the Oregon State Police,

Defendants.

Case No. 3:22-cv-01862

DECLARATION OF ADAM BRAATZ

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Declaration of Adam Braatz on Behalf of Plaintiff Mazama Sporting Goods

I, Adam Braatz, hereby declare as follows.

1. I am over the age of 18 years, and I am qualified to submit this declaration on behalf of Mazama Sporting Goods. I have personal knowledge of the facts set forth in this declaration through direct involvement and by personally reviewing Mazama Sporting Goods records and information.

2. I am the owner of Mazama Sporting Goods. I purchased the business in 2013.

3. Mazama Sporting Goods is an outdoor sporting goods retailer that has been serving Willamette Valley hunting and fishing enthusiasts since 1972. Mazama Sporting Goods has one location, at 1055 Bailey Hill Rd, Eugene, Oregon 97402.

4. Mazama Sporting Goods sells gear to men, women, and children, primarily for fishing and hunting. Among the products Mazama Sporting Goods sells are firearms, ammunition, and various related products.

5. Mazama Sporting Goods is authorized by law to sell firearms as a Federal Firearms Licensee ("FFL") licensed by the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF").

6. Mazama Sporting Goods is a "Gun dealer" as that term is used in Measure 114.

7. Under Measure 114, customers will need a "permit-to-purchase" before Mazama Sporting Goods can initiate a transaction for a firearm.

8. Once Measure 114 goes into effect, no Oregon resident will qualify to purchase a firearm at Mazama Sporting Goods until "permits-to-purchase" are issued.

9. I understand that the systems required to issue a "permit-to-purchase" are not currently in place. As a result, the effect of Measure 114 will be that individuals who wish to purchase firearms from Mazama Sporting Goods and who otherwise are lawfully entitled to do so

will be unable to do so. That will cost Mazama Sporting Goods substantial revenue, as it will mean that Mazama Sporting Goods is effectively unable to sell firearms.

10. In addition to selling firearms and other products, Mazama Sporting Goods currently sells a number of magazines capable of holding more than 10 rounds of ammunition. These magazines qualify as “large-capacity magazines” under Oregon’s new Measure 114.

11. If Measure 114 takes effect, Mazama Sporting Goods will no longer be permitted to lawfully sell such products in its Oregon stores, even though there is great demand for them.

12. In fact, if Measure 114 is allowed to go into effect, Mazama Sporting Goods will no longer be permitted even to keep these “large-capacity magazines.” Instead, it will have 180 days to get rid of them.

13. Measure 114 will therefore cost Mazama Sporting Goods considerable money in lost magazine sales if it is allowed to take effect.

14. Absent an injunction, Mazama Sporting Goods will suffer additional irreparable harm by being forced to cease lawful, federally licensed operations or face liability, both of which have a significant, harmful impact on its revenue.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of December, 2022.

By 
Adam Braatz